

1 [Counsel for filing parties listed on signature page]

2
3
4
5
6
7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 JOE KINDER and BRANDON MOSS, on
13 behalf of themselves and all others similarly
situated and the general public,

14 Plaintiffs,

15 v.

16 DJI TECHNOLOGY, INC.; SZ DJI
17 TECHNOLOGY CO., LTD.,

18 Defendants.

Case No. 4:22-cv-00601-KAW

**JOINT STIPULATION FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT**

19
20
21 Pursuant to F.R.C.P. Rule 12 and Civil L.R. 6-1, Plaintiffs Joe Kinder and Brandon Moss
22 (“Plaintiffs”) and Defendant DJI Technology, Inc. (“Defendant”) (collectively “the Parties”),
23 submit this Joint Stipulation for Extension of Time for Defendant to file its answer or otherwise
24 respond to Plaintiffs’ Class Action Complaint (Dkt. No. 1).

25 The Parties have met and conferred, and have agreed that the deadline for Defendant to
26 answer or otherwise respond to Plaintiffs’ Class Action Complaint be extended for 30 days, from
27 May 19, 2022 to June 21, 2022.

28 The Parties therefore stipulate as set forth above.

JOINT STIP FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT (4:22-CV-00601-KAW)

1 DATED: May 18, 2022

Respectively submitted,

3 By: /s/ Reuben D. Nathan

4 Reuben D. Nathan (SBN 208436)
rnathan@nathanlawpractice.com
5 **NATHAN & ASSOCIATES, APC**
2901 West Coast Highway, Suite 200
Newport Beach, CA 92663
6 Telephone: (949) 270-2798
Facsimile: (949) 209-0303

7
8 Matthew Righetti (SBN 121012)
matt@righettilaw.com
John Glugoski (SBN 191551)
9 jglugoski@righettilaw.com
RIGHETTI GLUGOSKI, PC
10 220 Halleck Street, Suite 220
San Francisco, CA 94129
11 Telephone: (415) 983-0900
Facsimile: (415) 397-9005

12
13 Attorneys for Plaintiffs
JOE KINDER and BRANDON MOSS

By: /s/ Andrew S. Wong

Andrew S. Wong (SBN 198227)
andrew.wong@dechert.com
DECHERT LLP
US Bank Tower
633 West 5th Street, Suite 4900
Los Angeles, CA 90071-2032
Telephone: (213) 808-5700
Facsimile: (213) 808-5760

Christina Guerola Sarchio (*pro hac vice*)
christina.sarchio@dechert.com
DECHERT LLP
1900 K Street, NW
Washington, D.C. 20006-1110
Telephone: (202) 261-3300
Facsimile: (202) 261-3333

Matthew F. Williams (SBN 323775)
matthew.williams@dechert.com
DECHERT LLP
One Bush Street, Suite 1600
San Francisco, CA 94104-4446
Telephone: (415) 262-4500
Facsimile: (415) 262-4555

Attorneys for Defendant
DJI TECHNOLOGY, INC.

18
19 **FILER'S ATTESTATION**

20 Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that concurrence in the filing of this
21 document has been obtained from the other signatories.

22 DATED: May 18, 2022

/s/ Andrew S. Wong
Andrew S. Wong